



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

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Federal Communications Commission
Office of Secretary

March 30, 1999

Al McCloud
Federal Communications Commission
Network Services Division
Room 235
2000 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL
CC DocuNet 96-98

Re: File No. NSD-L-98-21, New York Department of Public Service
Petition for Additional Authority to Implement Number Conservation
Measures

Dear Mr. McCloud:

Enclosed please find one original and five copies of the Connecticut
Department of Public Utility Control comments filed in the above noted
proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise E. Rickard

Louise Rickard
Acting Executive Secretary

Enc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of

New York Department of Public Service Petition
for Additional Authority to Implement Number
Conservation Methods

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File No.
NSD-L-98-21

COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

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for Additional Authority to Implement Number)	
Conservation Measures)	

COMMENTS OF THE CONNECTICUT
DEPARTMENT OF PUBLIC UTILITY CONTROL

I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the New York Department of Public Service (NYDPS) Petition to Implement Number Conservation Measures (Petition). NYDPS is seeking the flexibility and ability to implement telephone number conservation methods, some of which have been adopted in other jurisdictions. NYDPS also seeks the ability to implement a number of enforcement mechanisms and audit requirements as a means of achieving a more efficient allocation and use of numbering resources. The Commission should delegate NYDPS this authority because it is in a better position to determine what is in the best interests of the State of New York. Approval of the Petition will also provide NYDPS with the flexibility to implement conservation measures and delay the introduction of new area codes. Additionally, approval of the Petition will afford NYDPS the ability to impose

stricter requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded.

II. Discussion

On February 19, 1999, NYDPS petitioned the Commission seeking delegated authority to: (1) implement mandatory thousand block pooling trials; (2) explore options for implementing individual telephone number (ITN) pooling and establishing ITN pooling trials where technologically feasible; (3) implement interim unassigned number porting; (4) adopt and enforce number assignment standards; and (5) audit the use of numbering resources in conjunction with the Commission. Petition, p. 2.

CTDPUC supports the Petition and recommends that it be adopted by the Commission because its adoption should increase telephone number utilization efficiency. CTDPUc notes that some of NYDPS' proposed conservation measures have been adopted and are in use in other jurisdictions. For example, NYDPS has requested the Commission delegate authority to implement mandatory thousand block number pooling similar to that delegated to Illinois. Petition, p. 5. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000) blocks is clearly the underlying factor creating the NPA shortage today. Mandatory pooling would provide for a more efficient use of telephone numbers and minimize a wasteful allocation of these limited resources. NYDPS should be afforded the same opportunity as was provided in Illinois. Additionally, NYDPS' request for authority to investigate, and if appropriate, conduct trials of individual telephone number (ITN) pooling should be accepted. While providing

NYDPS with the ability to provide for a more efficient assignment of telephone numbers, such a trial would also provide the Commission and other states with information concerning whether adoption of ITN pooling on a national basis would be beneficial and alleviate the nationwide shortage in numbers. NYDPS should be permitted to conduct this trial so that the Commission and other states can make a determination as to whether it would be appropriate to conduct additional trials of this nature or that ITN pooling should be adopted on a national basis.

Regarding NYDPS' proposed enforcement measures and audit requirements, NYDPS seeks Commission authority to explore, and if appropriate, develop a more specific needs-based approach. Given the need for numbers and the surplus of assigned unused numbers, a requirement that carriers maximize NXX fill rates before seeking additional NXXs should also be adopted as a means of slowing down the unnecessary assignment of numbers. Similarly, requiring carriers to present a more detailed demonstration through the use of a utilization survey is an excellent starting point in ensuring that numbers are allocated in an efficient manner. Carriers should also be required to return any central office codes and 1,000 number blocks if they have not been used within 12 months of issuance. These measures alone should minimize the occurrence of code holders possessing excess number reserves. NYDPS has presented logical and solid reasoning supporting these measures. Therefore, CTDPU believes they should be approved.

III. Conclusion

NYDPS has offered the Commission several area code conservation measures that, if adopted as proposed, would provide NYDPS with the ability to implement a number of enforcement mechanisms and audit requirements as a means of achieving a more efficient allocation and use of numbering resources. This Petition is clearly in the public interest and therefore, should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC
UTILITY CONTROL

Donald W. Downes
Chairman

Glenn Arthur
Vice-Chairman

Jack R. Goldberg
Commissioner


John W. Betkoski, III
Commissioner

Linda Kelly Arnold
Commissioner

March 30, 1999

Connecticut Department of
Public Utility Control
Ten Franklin Square
New Britain, CT 06051

CERTIFICATION



Miriam L. Theroux
Commissioner of the Superior Court